

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF MASSACHUSETTS

03-12499 MLW

Terri Pechner-James and  
Sonia Fernandez,

Plaintiffs

v.

City of Revere, Thomas Ambrosino, Mayor,  
City of Revere Police Department, Terrence  
Reardon, Chief of Police, Bernard Foster,  
Salvatore Santoro, Roy Colannino, Frederick  
Roland, Thomas Doherty, John Nelson,  
James Russo, Michael Murphy, and Steven Ford  
Defendants.

FILED  
CLERK'S OFFICE  
NOV 11 P 3:29  
U.S. DISTRICT COURT  
DISTRICT OF MASS.

C.A. No.

AMOUNT \$150 52433  
SUMMONS ISSUED yes  
LOCAL RULE 4.1  
WAIVER FORM  
MCF ISSUED  
BY DPT CLK F.O.M

**NOTICE OF REMOVAL**

The Defendants, **CITY OF REVERE, THOMAS AMBROSINO, MAYOR and  
TERRENCE REARDON, CHIEF OF POLICE, BERNARD FOSTER, SALVATORE  
SANTORO, ROY COLANNINO, FREDERICK ROLAND, THOMAS DOHERTY,  
JOHN NELSON, JAMES RUSSO, MICHAEL MURPHY, AND STEVEN FORD**  
hereby file this Notice of Removal pursuant to 28 U.S.C. § 1441 and § 1446 for removal  
from the Superior court Department of the Trial Court of the Commonwealth of  
Massachusetts, Suffolk County, the action entitled, Terri Pechner-James and Sonia  
Fernandez v. City of Revere, et al. pending as Civil Action No. 03-4685G. The defendants  
state the following:

1. Removing parties are all of the defendants in the above-entitled action.
2. On or about October 8, 2003, the Plaintiffs filed this action in Suffolk

Superior Court of the Commonwealth of Massachusetts. A copy of the Complaint and all other process received in connection with this matter are attached as Exhibit A hereto.

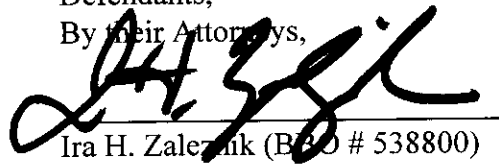
3. On November 11, 2003, Defendants City of Revere, Thomas Ambrosino, Mayor, Terrence Reardon, Chief of Police, accepted service of the summons and complaints. On information and belief, all other defendants have been served with process thereafter.
4. This Notice of Removal is filed within thirty (30) days of service of the summons and Plaintiffs' complaint.
5. This action involves claims that the Defendants sexually harassed the Plaintiffs and created a hostile work environment all in violation of the provisions of 42 U.S.C. § 2000(e)2. Plaintiffs allege that they are bringing their claims pursuant to 42 U.S.C. § 1983.
6. This Court has original jurisdiction of this action pursuant to 28 U.S.C. § 1331, and the action may therefore be removed to this Court by the Defendants by virtue of the provisions of 28 U.S.C. § 1441 and pursuant to 28 U.S.C. § 1446. The pendant state law claims may be heard and decided by this Court.
7. Notice of Removal will be given to all counsel promptly after filing this notice and a true and accurate copy of this notice will be filed with the Clerk of the Suffolk Superior Court.
8. Certified or attested copies of all records, proceedings, and docket entries in

the state court will be filed in this Court within 30 days, pursuant to Local Rule 81.1.

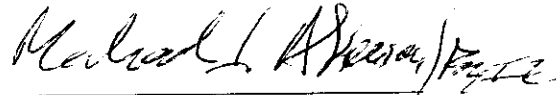
Wherefore, the Defendants **CITY OF REVERE, THOMAS AMBROSINO, MAYOR and TERRENCE REARDON, CHIEF OF POLICE, BERNARD FOSTER, SALVATORE SANTORO, ROY COLANNINO, FREDERICK ROLAND, THOMAS DOHERTY, JOHN NELSON, JAMES RUSSO, MICHAEL MURPHY, AND STEVEN FORD** give Notice of Removal of all claims against all Defendants from the Superior Court of Suffolk County, Massachusetts to this Court and respectfully request that this action proceed in this Court as an action properly removed to it.

Signed pursuant to Fed.R.Civ.P.11 that the statements of fact in the petition are true and correct to the best of my knowledge, information and belief and signed under the pains and penalty of perjury.

Defendants,  
By their Attorneys,

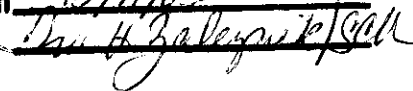


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I hereby certify that a true copy of the above document was served upon (each party appearing pro se and) the attorney of record for each other party by mail - hand - telecopier, on 12/11/03



Dated: 12/11/03